

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

DIVISION

FILED  
SEP 11 2023  
PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY *[Signature]*  
DEP CLK

Tammy Gallop Sharp

)  
(Enter above the full name  
of the Plaintiff[s] in this  
action).

vs.

City of Elizabeth City  
clo Montre Freeman  
City Manager

Case No. 2:23-cv-52-FL

(To be assigned  
by the Clerk of  
District Court)

)  
(Enter above the full name of  
**ALL** Defendant[s] in this action.  
Fed.R.Civ.P.10(a) requires that  
the caption of the complaint  
include the names of **all** the  
parties. Merely listing one  
party and "et al." is insufficient.  
Please attach additional sheets if  
necessary).

COMPLAINT

Plaintiff resides at: 270 Shadneck Rd Elizabeth City  
NC 27909

Defendant(s) name(s) and address(es), if known: City of Elizabeth City  
clo 'Montre' Freeman City Manager

Jurisdiction in this court is based on: \_\_\_\_\_

The acts complained of in this suit concern: \_\_\_\_\_

The City of Elizabeth City violated my rights under Article I, Section I of the North Carolina Constitution which states "We hold it to be self-evident that all persons are created equal; that they are endowed by their Creator with certain inalienable rights; that among these are life, liberty, the enjoyment of the fruits of their own labor, and the pursuit of happiness." By denying me promotions, title changes and raises for over seven years with no explanation given the City violated its own policy. By Personnel Policy Manual 3.0 Merit Principles Eligible employees shall receive merit pay increases based on the quality of their performance, subject to the availability of funds which clearly shows that there was money in the Electric budget for me but the City of EC chose to create

an illegal position of Project Manager for Randy Hassister.  
This position was not approved by City Council this  
position also resulted in "alleged" payroll fraud.  
By Personnel Policy V. Personnel Actions 3.0 Promotions  
When the promotional qualification of two(s) or more  
employees are judged to be equal, the employee with  
the longest service with the City shall be promoted.  
I have more years of service than Randy Hassister  
and more years of service than Ro. By the gross abuse  
of authority by the City of Elizabeth and City Manager  
they have deprive me "the fruits of my labor."

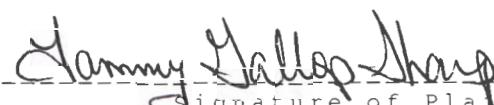
(If you need more space, or wish to include any further  
information for consideration, please attach additional sheets.)

I seek the following relief:

My back pay \$512.486 x 2 = \$1,024.972 and benefits,  
punitive damages to the total insurance policy  
limit for my pain and suffering, also attorney fees.

9/11/23

Date



Signature of Plaintiff

Address and Telephone Number of Plaintiff